

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE**

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UNITED STATES OF AMERICA, )  
                                  )  
Plaintiff,                  )  
                                  )  
v.                             ) **No. 3:16-CR-20**  
                                  ) **JUDGES COLLIER / GUYTON**  
MARK HAZELWOOD,            )  
SCOTT WOMBOLD,             )  
HEATHER JONES, and        )  
KAREN MANN,                )  
                                  )  
Defendants.                )

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**DEFENDANTS' MOTION IN LIMINE TO EXCLUDE  
PREJUDICIAL EXHIBIT DESCRIPTIONS**

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Defendants respectfully move this Court for an Order excluding certain of the Government's exhibit descriptions, submitted for purposes of identifying the exhibits in the Court's Jury Evidence Recording System ("JERS"), which contain prejudicial and inflammatory language that heavily favors the Government's case. The Government's exhibit descriptions are provocative, as opposed to helpful to the jury, and Defendants therefore request that the Court require the Government to replace such descriptions using a neutral naming convention.

The Court may find determination premature at this juncture and may prefer to rule on the matter before jury deliberations. Defendants raise this issue now to avoid the possibility of waiver of these objections and to minimize any efforts by Court staff in the renaming of exhibits if the Government's JERS names are found to be prejudicial and improper.

Good cause for this Motion is set forth in the contemporaneously filed Sealed Memorandum of Law. Defendants are simultaneously moving for permission to file the

memorandum and its exhibits under seal pursuant to Local Rule 26.2(b) and are currently filing them temporarily under seal pending approval by the Court.

Respectfully submitted,

/s/ John E. Kelly

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## **CERTIFICATE OF SERVICE**

I hereby certify that, on October 31, 2017, a true and correct copy of the foregoing document was filed electronically with the U.S. District Court for the Eastern District of Tennessee. Notice of this filing was served via the Court's electronic filing system on all counsel listed below:

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